

**Thompson Wigdor & Gilly LLP**

Kate Webber
kwebber@twglawyers.com

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MEMO ENDORSED

VIA FACSIMILE

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl St., Room 640
New York, NY 10007

Re: Arnold Schanfield v. Sojitz Corporation of America, et al., 07-cv-9716

Dear Judge McMahon:

We represent Plaintiff in the above-referenced matter and write to submit the parties' joint request for an extension of two discovery deadlines, specifically, the deadline for the completion of Plaintiff's deposition and the deadline for the submission of expert disclosures, including reports. The current deadline for Plaintiff's deposition is April 15, 2008; the parties respectfully request an adjournment of this deadline to May 30, 2008. The current deadlines for submission of expert reports are May 30, 2008 for Plaintiff and June 15, 2008 for Defendants; the parties respectfully request an adjournment of these deadlines to July 31, 2008 and August 15, 2008, respectively. This is the first request for an extension of these deadlines and all parties consent. Neither extension requires an adjournment of the existing October 31, 2008 deadline for the completion of all discovery.

The extensions are requested for the following reasons. First, the parties have made progress in resolving outstanding discovery disputes, including a number of issues concerning electronic discovery, but request additional time to continue to try to resolve the remaining issues. For example, the parties are investigating the use of certain electronic searching protocols that could resolve a discovery dispute but would require obtaining additional vendors and other expert assistance. Second, the discovery process is necessarily lengthened and complicated by the fact that many of the relevant documents are in Japanese and require translation. Third, Plaintiff asserts class-wide claims that require statistical analysis, including information that may be in Japanese and may not be electronically accessible. At this time Plaintiff does not have the data necessary to begin expert reports, is still negotiating with Defendants to obtain it and will need

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sufficient time to process and analyze the information for use in support of the class action claims.

The parties have held a number of telephonic conferences to advance discovery, including multiple discussions concerning our disputes and complications, acting in good faith to move the case forward. The parties therefore respectfully request an extension of the discovery deadlines as set forth herein.

Sincerely,


Kate Webber

cc: Laura Allen, Esq., Joanne Seltzer, Esq. (counsel for Defendants)